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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. IPC-E-14-38
APPLICATION OF IDAHO POWER)	
COMPANY FOR AUTHORITY TO FUND)	COMMENTS OF THE INDUSTRIAL
ITS CONTINUED PARTICIPATION IN)	CUSTOMERS OF IDAHO POWER
THE NORTHWEST ENERGY)	
EFFICIENCY ALLIANCE THROUGH)	
THE ENERGY EFFICIENCY RIDER.)	
_____)	

Pursuant to Notice Application and Notice of Modified Procedure issued by the Idaho Public Utilities Commission ("Commission") issued on November 26, 2014, the Industrial Customers of Idaho Power ("ICIP") by and through their attorney of record, Peter J. Richardson, hereby provides the following comments. Idaho Power Company ("Idaho Power" or the "Company") seeks approval to continue its participation in the Northwest Energy Efficiency Alliance (NEEA) through the energy efficiency rider for the 2015-2019 period.

Idaho Power filed its Application on October 19, 2014 seeking authority to continue participation and funding of NEEA's 2015-2019 business plan. Idaho Power's share of the

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2015-2019 budgeted activities and associated administrative expenses is not to exceed \$13,450,835. [Idaho Power Company Application, IPC-E-14-38, p.9.] The Company has reached agreement with NEEA not to fund four specific programs; Industrial Technical Training, Existing Building Renewal and Commercial Real Estate, Specific Market Transformation Activities, and Associate Administration Expenses. Opting out of these four program reduces Idaho Power's NEEA costs by \$1,634,322 over the five year future period. Idaho Power's share of funding NEEA is reduced by \$614,393 annually for the 2015 - 2019 time frame over the funding level for the past five years. [Id]

Industrial Technical Training

The Company states it is opting out of NEEA's industrial technical training classes because,

Idaho Power believes it can provide industrial technical training classes to its customers at a lower cost than what NEEA can offer. The Company believes it is better positioned to understand the profiles of its industrial customers than NEEA and can more effectively promote training that is tailored to the specific needs of its industrial customers. Idaho Power has established relationships with its industrial customers through outreach by its Major Customer Representatives, its Energy Efficiency Advisory Group ("EEAG"), its energy efficiency programs, and demand response program. [Direct Testimony of Warren Kline, Idaho Power, IPC-E-14-38, p.11.]

The firm providing the training for NEEA in the 2010 through 2014 period was Ecova. Ecova is a firm headquartered in Spokane, Washington that specializes in resource savings for its clients. The firm was founded in 1996 by a group of ex-Washington Water Power account executives. Through a series of mergers and acquisitions it is now a subsidiary of GDF Suez that owns a significant share of the same French parent company, Suez Environmental, that owns United Water Boise. The cost for the five year period 2010-2014 for NEEA's industrial

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technical trainings and attendee fee subsidy was \$986,658 including administrative and overhead costs. For this five year period Idaho Power's share for the training was \$317,554 with \$145,010 paid directly to Ecova for attendee fee subsidies. There were 44 in-class training sessions over the past five year period that included a total of 833 Idaho Power service area attendees. In addition 30 webinars were offered with 127 participants from the Company's service area.

[Idaho Power's Response to Staff's First Production Request No. 1, IPC-E-14-38.]

Idaho Power has not yet established the topics, nor has it estimated number of participants, for technical trainings for the five year period beginning in 2015. The Company states it will not limit the number of seats (NEEA's trainings were limited to 25 seats per session) and will also link all related documents on Idaho Power's web site for customers to view. The anticipated cost savings for providing the trainings is estimated to be \$64,120 over the years 2015-2019. [Idaho Power's Response to Staff's First Production Request No. 9, IPC-E-14-38.]

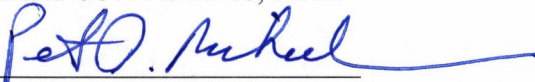
Conclusion

The ICIP believes technical training is an important element in Idaho Power's conservation portfolio. It has found the trainings valuable and applauds the Company's intention to continue the program. The ICIP supports the Company leaving NEEA for this program and providing the training itself rather than relying on NEEA. Idaho Power has a unique knowledge of the industrial customers in its service territory and will be able to tailor the classes and webinars to better address its customers' specific needs. Posting training materials and webinar presentation on the Company's website will help provide a wide dissemination of the materials. The ICIP believes limiting training sessions to 25 participants is too restrictive and concurs in the

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Company's decision to remove the attendance cap. The ICIP looks forward, should the Idaho Commission approve the Application, to participating in the technical training sessions provided by Idaho Power.

RICHARDSON ADAMS, PLLC

By 

Peter J. Richardson on behalf of the
Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I hereby certify that on the 22 day of December 2014, copies of the foregoing Comments of the Industrial Customers of Idaho Power were hand delivered to:

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